

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Court
Southern District of Texas
FILED

MAR 01 2017

UNITED STATES OF AMERICA

v.

THOMAS DODD

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§
§
§
§

CRIMINAL NO.

17 CR 0116

David J. Bradley, Clerk of Court

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**Conspiracy to Commit Mail and Wire Fraud
(18 U.S.C. § 1349)**

1. From no later than in or about December 2011 to in or about July 2012,
in the Southern District of Texas and elsewhere, the defendant,

THOMAS DODD,

did knowingly conspire and agree with others, known and unknown to the grand
jury, to commit the following offenses against the United States:

a. To knowingly devise and intend to devise a scheme and artifice
to defraud, and for obtaining money and property by means of false and fraudulent
pretenses, representations, and promises, and to knowingly use and cause to be used
the United States mails and private and commercial interstate carriers for the purpose

of executing the scheme and artifice to defraud, in violation of Title 18, United States Code, Section 1341; and

b. To knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money by means of false and fraudulent pretenses, representations, and promises and to knowingly transmit and cause to be transmitted by means of interstate wire communications for the purpose of executing such scheme or artifice, in violation of Title 18, United States Code, Section 1343;

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
Conspiracy to Make Conduit Contributions and False Statements
(18 U.S.C. § 371)

The Conspiracy and its Objects

2. From in or about January 2013 to at least in or about October 2013, in the Southern District of Texas and elsewhere, the defendant,

THOMAS DODD,

did knowingly conspire and agree with others, known and unknown to the grand jury, to commit the following offenses against the United States:

a. To knowingly and willfully make contributions to a candidate for federal office in the names of other persons, aggregating to more than \$10,000 in a

calendar year, in violation of Title 52, United States Code, Sections 30122 and 30109(d)(1)(D); and

b. To knowingly make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the Federal Election Commission, a department or agency of the United States government, in violation of Title 18, United States Code, Section 1001(a)(2).

Acts in Furtherance of the Conspiracy

c. In furtherance of the conspiracy described in Count Two and to effect the objects thereof, the defendant named therein and other persons both known and unknown, performed or caused the performance of the following overt act, among others not described herein, in the Southern District of Texas and elsewhere: on or about April 15, 2013, the defendant and his co-conspirators caused the electronic submission from the Southern District of Texas to the Federal Election Commission of a Report of Receipts and Disbursements for the authorized campaign committee of a federal candidate, which falsely reported the names of contributors.

All in violation of Title 18, United States Code, Section 371.

NOTICE OF FORFEITURE

18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), 21 U.S.C. § 853(p)

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice to the defendant,

THOMAS DODD,

that in the event of his conviction of conspiracy in violation of Title 18, United States Code, Section 1349 as charged in Count One of this Indictment, the United States intends to seek forfeiture of all property, real or personal, which constitutes or is derived from proceeds traceable to such offense.

Money Judgment

Defendant is notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

Defendant is notified that in the event that property subject to forfeiture, as a result of any act or omission of defendant,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property that cannot be divided without difficulty,

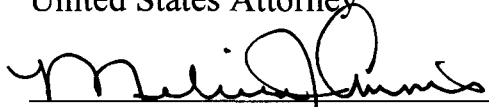
the United States will seek to forfeit any other property of the defendant up to the

total value of the property subject to forfeiture pursuant to Title 21, United States Code, Section 853(p), as incorporated by reference in Title 28, United States Code, Section 2461(c).

A TRUE BILL //

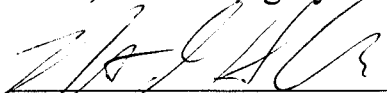
Original signature on File
FOREPERSON OF THE GRAND JURY _____

KENNETH MAGIDSON
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RAYMOND N. HULSER
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